

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

IN RE: HCA HEALTHCARE, INC. ) No. 3:23-cv-00684  
DATA SECURITY LITIGATION )  
 )  
 )  
 )  
 )

---

**JOINT NOTICE OF SETTLEMENT AND  
MOTION TO EXTEND STAY**

Plaintiffs and Defendant hereby jointly notify the Court that they have reached an agreement in principle on the material terms of a settlement of this case, which would resolve and release all claims pending in the above-captioned action on a classwide basis.

On November 2, 2024, the Court entered an order staying this Action pending the Parties' scheduled mediation, which took place on February 19, 2025. Dkt. 168. The Court further ordered the Parties to inform the Court regarding the outcome of mediation on or before March 5, 2025. *Id.* Ultimately, the mediation on February 19, 2025, was successful, and the Parties reached an agreement in principle. That agreement is being memorialized into a final settlement agreement. Once signed, Plaintiffs will prepare a motion for preliminary approval to present for the Court's review. The Parties believe these remaining tasks can be completed within the next sixty (60) days.

WHEREFORE, the Parties jointly move to extend the stay of this Action pending the Court's consideration of the Parties' settlement agreement.

Dated: March 5, 2025

Respectfully submitted,

*/s/ J. Gerard Stranch, IV*  
J. Gerard Stranch, IV (TN BPR # 23045)  
Grayson Wells (TN BPR # 039658)  
**STRANCH, JENNINGS & GARVEY, PLLC**  
223 Rosa L. Parks Avenue, Suite 200  
Nashville, TN 37203

Tel: (615) 254-8801  
[gstranch@stranchlaw.com](mailto:gstranch@stranchlaw.com)  
[gwell@stranchlaw.com](mailto:gwell@stranchlaw.com)

Jean S. Martin (admitted *pro hac vice*)  
**MORGAN & MORGAN COMPLEX  
LITIGATION GROUP**  
201 North Franklin Street, 7th Floor  
Tampa, FL 33602  
Tel: (813) 559-4908  
[jeanmartin@forthepeople.com](mailto:jeanmartin@forthepeople.com)

*Interim Co-Lead Class Counsel*

/s/ Marissa Alter-Nelson (signed with permission)  
Marissa Alter-Nelson (admitted *pro hac vice*)  
**LATHAM & WATKINS LLP**  
1271 Avenue of the Americas  
New York, NY 10020  
(212) 906-0600  
[marissa.alter-nelson@lw.com](mailto:marissa.alter-nelson@lw.com)

Andrew B. Clubok (admitted *pro hac vice*)  
Susan E. Engel (admitted *pro hac vice*)  
**LATHAM & WATKINS LLP**  
555 Eleventh Street, NW, Suite 1000  
Washington, D.C. 20005  
(202) 637-2200  
[andrew.clubok@lw.com](mailto:andrew.clubok@lw.com)  
[susan.engel@lw.com](mailto:susan.engel@lw.com)

Melanie M. Blunschi (admitted *pro hac vice*)  
**LATHAM & WATKINS LLP**  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111  
(415) 391-0600  
[melanie.blunschi@lw.com](mailto:melanie.blunschi@lw.com)

*Counsel for Defendant Healthcare Corporation of  
America*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 2025, a true and correct copy of the foregoing document has been served upon all counsel of record via CM/ECF.

*/s/ J. Gerard Stranch, IV*  
J. Gerard Stranch, IV